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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,)
Plaintiff,)
vs.)
CHARLES RAY BELL, JR.,)
Defendant.)
Case No. 2:14-cr-00138-JAD-VCF

STIPULATION TO WITHDRAW MOTION

IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bodgen, United States of Attorney, and Phillip N. Smith, Jr., Assistant United States Attorney, counsel for the United States of America, and Russell E. Marsh, Esquire, Wright Stanish & Winckler, counsel for Defendant, that the Defendant be allowed to withdraw his Motion for Production of Additional Police Reports (Docket #35), with leave to file an amended motion, if necessary.

This stipulation is entered for the following reasons:

1. On December 1, 2014, the Defendant, through prior counsel, filed a Motion for Production of Additional Police Reports (the “Motion”). *See* Docket #35. The parties filed several stipulations to extend the time for the government to respond to the Motion.

2. The Government filed its response on March 23, 2015 (Docket #53). Pursuant to previous Stipulation (Docket #54), the Defendant's reply was due on April 6, 2015. *See* Docket #55. This matter is set for a hearing on April 16, 2015 at 10:00 am (Docket #56).

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3. Defendant Bell requests that he be allowed to withdraw his motion, with leave to file an amended motion if Defendant is unable to obtain the materials requested through other means. The Government does not oppose this request.

4. The parties request that the previously scheduled hearing remain set for purposes of a status hearing, and that Defendant be transported for this hearing.

Dated: April 6, 2015.

DANIEL G. BOGDEN
UNITED STATES ATTORNEY

WRIGHT STANISH & WINCKLER

BY /s/ Phillip N. Smith, Jr.
PHILLIP N. SMITH, JR.
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BY /s/ Russell E. Marsh
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ORDER

Based on the pending Stipulation of counsel, and good cause appearing therefore,

IT IS HEREBY ORDERED that the Defendant's Motion for Production of Additional Police Reports (Docket #35) is hereby withdrawn and dismissed without prejudice to the filing of an amended motion. This case is scheduled for a status hearing on April 16, 2015, at 10:00 a.m. Defendant will be transported for this hearing.

DATED this 6th day of April, 2015.

Carl Radke

CAM FERENBACH
UNITED STATES MAGISTRATE JUDGE